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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE EASTERN DISTRICT OF WASHINGTON**

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11 PATRICK FLEETWOOD, ET. AL.,

12 Plaintiffs,

13 vs.

14 WASHINGTON STATE
15 UNIVERSITY,

16 Defendant.

17
18 Case No. 2:20-cv-355-SAB

19
20 **DECLARATION OF MATTHEW**
21 **CROTTY**

22
23 I, Matthew Crotty, declare:

24 1. I am competent to testify and have personal knowledge of what is
25 written in this declaration. I represent Plaintiffs in this lawsuit.

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27 DECLARATION - 1

1 2. Attached hereto as **Exhibit A** are true and correct copies of excerpts of
2 the March 31, 2022, deposition of Dan Patterson (as well as Exhibit 1 of that
3 deposition) taken via Zoom and recorded by Certified Court Reporter d'Anne
4 Meyers.
5

6 I declare under penalty of perjury under the laws of the United States that the
7 foregoing is true and correct.
8

9 DATED this April 21, 2022.
10
11 By: /s Matthew Crotty
12 Matthew Z. Crotty
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DECLARATION - 2

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CERTIFICATE OF SERVICE

2 I certify that I electronically filed the foregoing with the Clerk of the Court
3 using the CM/ECF system, which will send notification of such filing to those
4 attorneys of record registered on the CM/ECF system. All other parties, if any, shall
5 be served in accordance with the Federal Rules of Civil Procedure.
6

7 Dated this April 25, 2022.
8

9 */s Matthew Crotty*
10 MATTHEW Z. CROTTY
11 Crotty & Son Law Firm, PLLC
12 905 West Riverside, Suite 404
13 Spokane, WA 99201
14 Telephone: 509.850.7011
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DECLARATION - 3